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September 16, 1999

Mr. Lester Snow
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Re: CALFED BAY-DELTA PROGRAM
Programmatic Environmental Impact Statement/Environmental Impact
Report

Lester
Dear ~~Mr. Snow~~:

The Northern Sacramento Valley CALFED Advisory Group reconvened last week to assess how the CALFED Bay-Delta Program (CALFED) draft preferred alternative will impact the Sacramento Valley. Participants at this meeting expressed unease and dissatisfaction with the direction CALFED appears to be heading, especially with the Record of Decision looming less than one year from now. Those of us in the Sacramento Valley are very concerned that select elements of CALFED's proposed program are currently being implemented well in advance of EIS/EIR public input and a Record of Decision and that many of the issues conveyed to CALFED by this group over two years ago still remain unaddressed.

Specifically, what benefits does the CALFED proposed solution bring to the Sacramento Valley? In its current form, there appears to be limited benefits in this plan for Northern California water users. The preferred alternative provides no new water for our region, and advocates that water and land will be removed from agriculture to compensate for Bay-Delta problems that were not caused by our actions. CALFED has advocated that "we all get better together with no redirected impacts". Not only are we getting better, but our region will bear the brunt of redirected impacts". We feel that the proposed solution emphasizes the interests of the Bay-Delta and the exporters that rely upon it. We are alarmed by several premises interwoven through the draft preferred alternative:

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The solution provides no new water to the Sacramento Valley and does not appear to compensate for water already lost due to Central Valley Project Improvement Act (CVPIA) and the Endangered Species Act (ESA).

CALFED must provide assurances that all aspects of water management – including new surface storage as well as groundwater storage – will move forward together with equal emphasis. Assurances can only be achieved through actions that demonstrate that these programs will move forward. We cannot bear the risks associated with holding off on new surface storage until “soft path” measures are satisfied.

Additional specific information on storage and conveyance facilities is needed to fully link background studies to proposed actions. For example, the size and configuration of the proposed Hood diversion and conveyance modification is not disclosed in sufficient detail. On the other hand, the criteria for triggering an open door to expansions and extensions to this facility are overly rigid.

The Environmental Water Account (EWA) requires additional explanation and assurances that: 1) Clear and practical criteria that will hold EWA Agencies accountable for their actions; and 2) program water acquired north of the Delta will impart local water supply reliability, environmental and economic benefits.

CALFED should develop a “Local Coordination Plan” that clearly shows how all CALFED program elements, particularly those involving groundwater or acquisitions of land and water, will be implemented in concert with input from local interests. CALFED must define the assurances that will ensure that projects initiated within the scope of the preferred alternative will meet criteria established by area-of-origin in protections, local laws and ordinances and local Groundwater Management Plans.

CALFED's restoration efforts must consolidate the myriad of ongoing agency programs into a cohesive plan that focuses on maintaining existing habitat and fully utilizes public lands prior to acquiring new land. CALFED should carefully consider and plan to avoid adverse social, economic or environmental effects to local communities before embarking on a large-scale ecosystem restoration program.

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CALFED should summarize existing regulatory programs, explain associated authority and develop a coordinated plan that shows how conflicts between the Endangered Species Act, Clean Water Act, Central Valley Project Improvement Act and other regulatory mandates will be rectified.

Sacramento Valley water use efficiency will not produce new water to satisfy Bay-Delta needs. We are concerned that the preferred status given to users who somehow comply with efficiency standards may in effect elevate those water rights above "non-compliant" users (see page 124, Revised Phase II Report). Where is the "base line" for conservation efforts drawn? CALFED must absolutely avoid advocating crop control and/or land fallowing as a method of securing program water from the Sacramento Valley.

Our discussion of these concerns, as well as our views expressed over two years ago regarding flood control, new facilities, groundwater and other area-of-origin concerns have been expanded upon in the document that is attached. We urge that you consider these critical issues as you refine a solution to satisfy the environmental and water supply problems of the Bay-Delta. Definite steps are proposed to take care of Delta exporters and environmental concerns in your plan. We need specific assurances of additional surface water supplies and/or supply reliability for the Sacramento Valley. The north state ecosystem and economy can not be sacrificed to improve the Delta and south state water supply.

Our concerns need to be addressed in detail by CALFED. We want substantiated, straightforward answers to our questions and welcome the opportunity to meet with you to discuss these issues face-to-face. If you have any questions or would like to arrange a meeting with our group, please do not hesitate to contact Roger Sherill, General Manager of the Rio Alto Water District, at 530-347-3835.

Sincerely,



Donald R. Bransford
President